

Remarks

Claims 1-8, 11, and 14-37 are pending but stand rejected. In an office action dated August 20, 2005, the Examiner made that rejection final. In view of the following remarks, the Applicant respectfully asks for the Examiner's thoughtful reconsideration.

Rejections Under 35 U.S.C. § 102

The Examiner rejected Claims 1-8, 11, 15-22, 24-27, 29-34, and 36-37 under Section 102 citing U.S. Patent 5,974,234 issued to Levine.

Levine teaches a proxy server (107A) that can provide a client with a web page containing information regarding a printer. Levine. Col. 10, lines 22-57 and col. 13, lines 21. That information can includes "site settable" information for the printer and a job queue. Levine, col. 10, lines 50-57. Based on user input entered through the provided web page, the proxy server directs job management commands. Levine, col. 10, line 58 through col. 11, line 5. Job management commands regard jobs in a print queue. Levine's job management commands are limited to commands that affect jobs already in a queue. These include commands for holding and releasing a job, canceling a job, and moving a job within the queue. Levine. Col. 14, lines 45-49 and col. 15, line 63 through col. 16, line 33.

Claims 1-6 and 36: Claim 1 is directed to a method for representing production devices on a network. Claim 1 recites the following acts.

1. hosting an interface for one or more production devices, each interface having user accessible controls for selecting production options for a target document;
2. providing the interface for a selected one of the production devices to a client upon receipt from the client of a production request for the target document; and

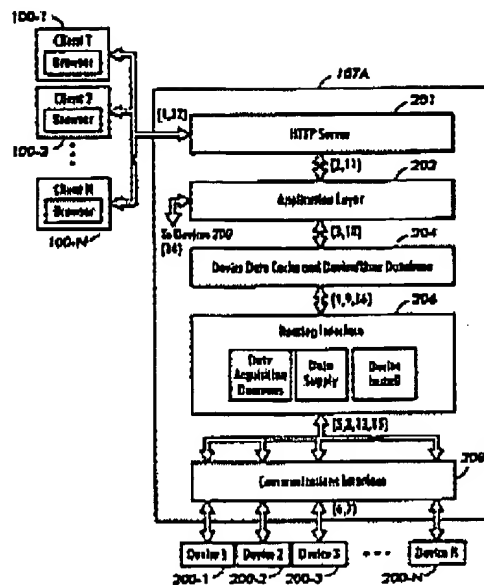
3. managing the production of the target document for the selected production device using production options selected through the interface.

To summarize, Claim 1 recites, upon receipt of a production request for a target document, the provision of an interface having controls for selecting production options for a selected production device and then managing the production of the target document for that production device using production options selected through that interface.

In a prior response, the Applicant argued that Levine failed to teach the second act of providing the interface and the third act of managing the production of the target document. In the current office action, the Examiner responded with the following contentions:

1. In Column 11 Lines 5-20 Levine described a communications interface.
2. In Column 15 Lines 45-65 Levine described an API for issuing job management commands using function calls and Get/Set operations.
3. In Column 9 Lines 55 -65 Levine described a Mark Service and a User Interface associated with the printer device.
4. In Column 13 Lines 15-20 Levine disclosed retrieving a web page for the particular printing device and returning the page to the client.
5. Thus Levine disclosed an interface upon receipt of a production request for a target document and managing the target document using production options selected through the interface.

The communication interface (208) described by Levine, column 11, lines 5-20 is a programmatic interface and is NOT an "interface having user accessible controls for selecting production options for a target document" as recited by Claim 1. Moreover, Levine's communication interface (208) is never exposed to a client. Levine, Fig. 5 is reproduced below to help illustrate.



With respect to the Examiner's second contention, Levine's API (206) interacts with Levine's communication interface (208) to implement a requested "get" or "set" operation. Such is irrelevant with respect the act of "providing the interface" recited by Claim 1.

With respect to the Examiner's third contention, Levine's mark service (132) and user interface (134) are also irrelevant with respect the act of "providing the interface" recited by Claim 1. Levine's user interface (134) is a physical user interface provided on a printing device (12) and cannot be provided to a client.

With respect to the Examiner's fourth contention, Levine does teach sending of web pages containing requested information to client (sol. 13, lines 6-24). Levine also teaches receiving data from those clients (col. 13, lines 25-40). Levine however does **NOT** teach or suggest providing a web page "for a selected one of the production devices to a client upon receipt from the client of a production request for the target document" as recited by Claim 1.

The Examiner's fifth contention is mistaken. As clarified above, Levine does **NOT** disclose providing "an interface upon receipt of a production request for a target

document" where that interface includes user accessible controls for selecting production options for the target document as recited by Claim 1.

Simply stated, Levine mentions nothing of providing an interface upon receipt of a production request for a target document where that interface includes user accessible controls to selecting production options for the target document. For at least these reasons, Claim 1 is patentable over Levine. Claims 2-6 and 36 are also patentable over Levine based at least on their dependency from Claim 1.

Claim 7: Claim 7 is directed to a method for representing production devices on a network. As amended, Claim 7 includes the following combination of elements.

1. detecting new production devices connected to the network;
2. using production logic for each detected device, generating an interface having user accessible controls for selecting production options for and directing production of a document on that detected production device;
3. hosting the generated interface for each production device;
4. providing the interface for a particular production device to a client upon receipt from the client of a production request for a target document;
and
5. managing the production of the target document for the particular production device using production options selected through the interface.

Claim 7 requires providing an interface upon receipt of a production request for a target document and then managing the production of the target document using production options selected through the interface. As made clear above with respect to Claim 1, Levine does not teach these elements.

Furthermore, The Examiner is mistaken in asserting that Levine, col. 14 lines 25-35 and col. 15, lines 45-65 teach the act of generating an interface as recited in Claim 7. That act requires that an interface be generated using production logic for a detected device. The generate interface must have user accessible controls for selecting production options for that detected device. The passages cited by the

Examiner mention nothing of the use of production logic let alone the use of production logic to generate an interface that has user accessible controls.

For at least these reasons, Claim 7 is patentable over Levine.

Claims 8, 11, 14 and 15: Claim 8 is directed to a method for managing electronic document production over a computer network. As amended, Claim 8 includes the following combination of elements.

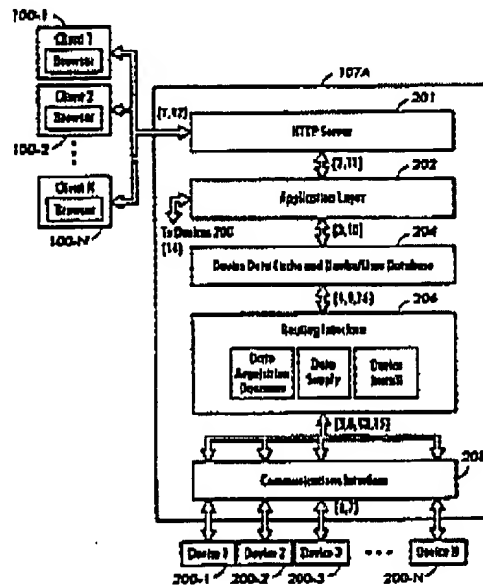
1. a proxy service receiving a production request;
2. the proxy service, returning an interface having user accessible controls for identifying a target document and for selecting production options for the target document;
3. the proxy service receiving identification of a target document and production options selected through the user interface; and
4. the proxy service managing production of the identified target document for the production device using production options selected through the interface.

In a prior response, the Applicant pointed out that Levine mentioned nothing of providing a user interface that includes controls for identifying a target document. The Examiner responded with the following contentions;

1. In Column 11 Lines 5-20 Levine described a communications interface,
2. while in Column 15 Lines 45-435 Levine described an API for issuing job management commands using function calls and Get/Set operations.
3. In Column 9 Lines 55 -65 Levine described a Mark Service and a User Interface associated with the printer device.
4. In Column 13 Lines 15-20 Levine disclosed retrieving a web page for the particular printing device and returning the page to the client.

With respect to the first contention, the communication interface (208) described by Levine, column 11, lines 5-20 is a programmatic interface and is **NOT** an

"interface having user accessible controls for identifying a target document and for selecting production options for the target document" as recited by Claim 8. Moreover, Levine's communication interface (208) is never exposed to a client in a manner that would enable it to provide user accessible controls to a client. Levine, Fig. 5 is reproduced below to help illustrate.



With respect to the Examiner's second contention, Levine's API (206) interacts with Levine's communication interface (208) to implement a requested "get" or "set" operation. Such is irrelevant with respect the act of "returning the interface" recited by Claim 8.

With respect to the Examiner's third contention, Levine's mark service (132) and user interface (134) are also is irrelevant with respect the act of "providing the interface" recited by Claim 1. Levine's user interface (134) is a physical user interface provided on a printing device (12) and cannot be returned to a client.

With respect to the Examiner's fourth contention, Levine does teach sending of web pages containing requested information to client (col. 13, lines 6-24). Levine also teaches receiving data from those clients (col. 13, lines 25-40). Levine however

does **NOT** teach or suggest providing a web page that includes user accessible controls for identifying a target document as recited by Claim 8.

Simply stated, Levine mentions nothing of returning an interface that includes user accessible controls for identifying a target document. For at least these reasons, Claim 8 is patentable over Levine. Claims 11, 14, and 15 are also patentable over Levine based at least on their dependency from Claim 8.

Claims 16-21 and 37: Claim 16 is directed to a computer program product for managing electronic document production over a computer network. As amended, the product includes a computer useable medium having computer readable instructions for the following:

1. receiving, from a client, a production request for a production device for a target document;
2. in response to the request, returning to the client an interface for the production device, the interface having user accessible controls for selecting production options for the target document;
3. managing the production of the target document using production options selected through the interface.

As above with respect to Claim 1, Levine mentions nothing of returning a user interface in response to a production request for a target document where the user interface includes controls for selecting production options for the target document. Levine also does not teach managing production of a target document using production options selected through that interface. For at least these reasons, Claim 16 is patentable over Levine. Claims 17-21 and 37 are also patentable over Levine based at least on their dependency from Claim 16.

Claims 22-27: Claim 22 is directed to a system for representing production devices on a network. As amended, Claim 22 includes the following combination of elements:

1. a database containing production logic for one or more production devices, the production logic for each production device including data for generating a user interface having particular controls for selecting production options;
2. an interface generator operable to access production logic for a production device in the database and, following receipt of a production request for a target document, to serve an interface for the production device, the interface, being generated according to the accessed production logic, having user accessible controls for selecting production options for the target document; and
3. a production engine, in electronic communication with the interface generator, the production engine operable to manage production of the target document for the production device using production options selected through the interface.

Levine simply fails to an interface generator that is operable in the manner recited in Claim 22. That is, Levine fails to teach an interface generator that is operable to:

1. access production logic for a production device in the database and,
2. following receipt of a production request for a target document;
 - a. to serve an interface for the production device, the interface,
 - b. being generated according to the accessed production logic,
 - c. having user accessible controls for selecting production options for the target document.

In support of the rejection, the Examiner simply states "The Examiner respectfully disagrees with the Applicant regarding user interfaces for reasons stated above." Those reasons relate to the same mistaken contentions the Examiner made with respect to Claim 1. Consequently, the Examiner is mistaken with respect to Claim 22.

For at least these reasons, Claim 22 is patentable over Levine. Claims 23-27 are also patentable over Levine based at least on their dependency from Claim 22.

Claims 29-34: Claim 35 is directed to a system for managing electronic document production over a computer network. As amended Claim 35 includes the following combination of elements.

1. one or more production devices;
2. a client operable to identify a target document, select one of the one or more production devices, and direct a production request to the selected production device;
3. a proxy service in electronic communication with the client and the production device, the proxy service operable to return, in response to receiving a production request, to the client an interface for selecting production options for the selected production device and to manage the production of the target document for the selected production device using production options selected through the interface.

Levine simply fails to teach a proxy service that is operable, in response to receiving a production request, to return to a client an interface for selecting production options for a selected production device for the selected production device.

In support of the rejection, the Examiner simply states "The Examiner respectfully disagrees with the Applicant regarding user interfaces for reasons stated above." Those reasons relate to the same mistaken contentions the Examiner made with respect to Claim 1. Consequently, the Examiner is mistaken with respect to Claim 29.

For at least these reasons, Claim 29 is patentable over Levine. Claims 30-34 are also patentable over Levine based at least on their dependency from Claim 29.

Rejections Under 35 U.S.C. § 103

The Examiner rejected Claims 14, 23, 28, and 35 under Section 103 as being unpatentable over Levine in view of citing U.S. Patent 6,757,071 issued to Goodman.

Claim 14: Claim 14 depends from Claim 8 and includes all the limitation of that base claim. For the same reasons Claim 8 is patentable, so is Claim 14.

Claim 23: Claim 23 depends from Claim 22 and includes all the limitation of that base claim. For the same reasons Claim 22 is patentable, so is Claim 23.

Claim 28: Claim 28 is directed to a system for representing production devices on a network. Claim 28 recites the following combination of elements.

1. a database containing production logic for one or more production devices, the production logic for each production device including data for generating a user interface having particular controls for selecting production options;;
2. a device locator operable to detect and identify new devices present on the network;
3. an update service operable to acquire the production logic for each of the detected devices and update the database with the acquired production logic;
4. an interface generator operable to access the production logic for a production device in the database and serve an interface for the production device, the interface being generated to include user accessible controls for selecting production options for a document as specified by the production logic for that production device;
5. a plan generator operable to merge the document with production options selected through the interface; and
6. a device driver operable to deliver the production plan to the production device.

As clarified with respect to Claim 22, Levine and Goodman fail to an interface generator that is operable in the manner recited in Claim 28. That is, Levine fails to teach an interface generator that is operable to:

1. access production logic for a production device in the database and,
2. following receipt of a production request for a target document;
 - a. to serve an interface for the production device, the interface,

- b. being generated according to the accessed production logic,
- c. having user accessible controls for selecting production options for the target document.

For at least this reason, Claim 28 is patentable over Levine and Goodman.

Claim 35: Claim 35 is directed to a system for managing electronic document production over a computer network and like Claims 22 and 28 recites an interface generator that is operable to:


- 1. access production logic for a production device in the database and,
- 2. following receipt of a production request for a target document;
 - a. to serve an interface for the production device, the interface,
 - b. being generated according to the accessed production logic,
 - c. having user accessible controls for selecting production options for the target document.

For at least the same reasons Claims 22 and 228 are patentable, so is Claim 35

Conclusion

In view of the foregoing remarks and amendments, Applicant respectfully submits that claims 1-8, 11, and 14-37 define allowable subject matter. The Examiner is requested to indicate the allowability of all claims in the application and to pass the application to issue.

Respectfully submitted,
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